

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

IN RE:)	
)	
SCOTT K. WILLIAMS,)	
)	
Debtor.)	CAUSE NO.
)	9:22-bk-90147-BPH
)	
RICHARD J. SAMSON, AS)	
CHAPTER 7 TRUSTEE OF THE)	
ESTATE OF SCOTT K. WILLIAMS,)	
)	
Plaintiff,)	
)	
-vs-)	
)	
CANDY WILLIAMS AND VIKING)	
INVESTMENTS, LLC,)	
)	
Defendants.)	

Taken at 310 West Spruce Street
Missoula, Montana
Thursday, September 14, 2023 - 2:56 P.M.

D E P O S I T I O N

OF

CANDY WILLIAMS

Reported by Terra Rohlfs, RPR, Jeffries Court Reporting,
Inc., 1015 Mount Avenue, Suite B, Missoula, Montana
59801, (406)721-1143, Freelance Court Reporter and
Notary Public for the State of Montana, residing in
Hamilton, Montana, jrcrcourt@montana.com

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EXHIBIT

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A P P E A R A N C E S

1
2
3 Trent M. Gardner, Esq.
Hannah S. Willstein, Esq.
4 Goetz, Geddes & Gardner, P.C.
The Ketterer Building, 35 North Grand
5 P.O. Box 6580
Bozeman, Montana 59771-6580
6 tgardner@goetzlawfirm.com
Associated Staff:
7 hwillstein@goetzlawfirm.com
appearing on behalf of Plaintiff, Richard J.
8 Samson, as Chapter 7 Trustee of the Estate of
Scott K. Williams.
9
10 Edward "Rusty" A. Murphy, Esq.
11 Murphy Law Offices, PLLC
127 North Higgins, Suite 310
13 Missoula, Montana 59802
rusty@murphylawoffices.net
appearing on behalf of Defendant Candy Williams
and Viking Investments, LLC.
14
15
16 Also appearing: Richard J. Samson and Scott
Williams.
17
18
19
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S T I P U L A T I O N S

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3 It was stipulated by and between counsel for
4 the respective parties that the deposition be taken
5 by Terra Rohlfs, RPR, Freelance Court Reporter and
6 Notary Public for the State of Montana, residing in
7 Hamilton, Montana.
8
9 It was further stipulated and agreed by and
10 between counsel for the respective parties that the
11 deposition be taken in accordance with the Montana
12 Rules of Civil Procedure.
13
14 It was further stipulated and agreed by and
15 between counsel for the respective parties that all
16 objections except as to form would be reserved
17 until time of trial, and that said objections would
18 have the same force and effect as if interposed at
19 the time of taking the deposition.
20
21 It was further stipulated and agreed by and
22 between counsel for the respective parties and the
23 witness that the reading and signing of the
24 deposition would be expressly reserved.
25

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1 THURSDAY, SEPTEMBER 14, 2023
 2 Thereupon,
 3 CANDY WILLIAMS,
 4 a witness of lawful age, having been first duly
 5 sworn to tell the truth, the whole truth and
 6 nothing but the truth, testified upon her oath as
 7 follows:

EXAMINATION

BY MR. GARDNER:

10 **Q. Could you state your name and address for**
 11 **the record.**

12 A. Candy Williams, 11423 Spotted Fawn Lane,
 13 Bigfork, Montana.

14 **Q. And Ms. Williams, I'm Trent Gardner, as**
 15 **you know, and I represent the trustee of your**
 16 **husband Scott's bankruptcy estate, okay?**

17 A. Okay.

18 **Q. Have you ever been deposed before?**

19 A. No.

20 **Q. You just sat through your husband Scott's**
 21 **deposition, do you have any questions about the**
 22 **process or how it works?**

23 A. No.

24 **Q. Okay. And as I told Mr. Williams, please**
 25 **wait for me to finish asking the question before**

1 **Q. Do you work remotely for that company**
 2 **now?**

3 A. Yes.

4 **Q. How long have you worked remotely?**

5 A. Since May of 2020, when I moved to
 6 Montana.

7 **Q. So COVID fixed the no-remote policy your**
 8 **company had?**

9 A. No, actually, I gave notice in January
 10 and they were like, yeah, we don't want to lose you
 11 so work remotely.

12 **Q. Oh, good.**

13 A. Winning. {Laughter.} They're the
 14 company that's no remote, so...

15 **Q. What did you do before you worked for the**
 16 **mortgage company?**

17 A. I worked for Kalispell Electric.

18 **Q. What years did you work for Kalispell**
 19 **Electric?**

20 A. I don't have -- I don't recall the dates
 21 off the top of my head.

22 **Q. Roughly?**

23 A. I worked there for three years, and I
 24 left in 2011.

25 **Q. So you lived in the Flathead up until**

Page 7

Page 9

1 **you start your answer. And if you can, give verbal**
 2 **answers, okay?**

3 A. Okay.

4 **Q. Could you briefly tell me your**
 5 **educational background.**

6 A. High school.

7 **Q. Okay. And are you currently employed?**

8 A. Yes.

9 **Q. How are you employed?**

10 A. I'm employed -- like how am I employed
 11 like --

12 **Q. What is your job?**

13 A. Payroll, I do payroll for a mortgage
 14 company.

15 **Q. What's the name of that company?**

16 A. Primary Residential Mortgage.

17 COURT REPORTER: Sorry?

18 THE WITNESS: Primary Residential
 19 Mortgage.

20 **Q. (BY MR. GARDNER) How long have you been**
 21 **with Primary Residential Mortgage?**

22 A. Going on 14 years.

23 **Q. Did you start working with them in Salt**
 24 **Lake?**

25 A. Yes.

1 **2011?**

2 A. I lived in the Flathead back and -- I've
 3 been back and forth, but I lived there for a couple
 4 years and I moved to Salt Lake because my dad got
 5 sick.

6 **Q. Okay. So you moved to Salt Lake in 2011?**

7 A. Yes, I believe it was 2011.

8 **Q. And then you lived there until 2020, when**
 9 **you moved back to the Flathead?**

10 A. Correct.

11 **Q. Okay. Have you ever filed bankruptcy?**

12 A. Medical bankruptcy?

13 **Q. Any kind of bankruptcy.**

14 A. Okay, yes.

15 **Q. When was that?**

16 A. Roughly '94/'95.

17 **Q. And what was it that led to that**
 18 **bankruptcy?**

19 A. My daughter got really sick and I had a
 20 lot of medical bills.

21 **Q. Sorry.**

22 **Tell me about how Viking Investments came**
 23 **about.**

24 A. Living in the Flathead and being from the
 25 Flathead, I know that the way to make money is to

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1 own your own business, you can't make it there
2 working for someone else. So I had -- I have
3 family in the Flathead, so we talked many times, my
4 daughter, my mother, about doing coffee shops, even
5 my aunt, it was a big deal at that time, so that's
6 why I created Viking Investments.

7 **Q. And Viking Investments was created in**
8 **late July of 2019; right?**

9 A. Yes, but I did the emails and all of
10 that, set up the email and all of that stuff like
11 in April of 2020.

12 **Q. The email for what?**

13 A. For Viking Investments.

14 **Q. Viking Investments has an email?**

15 A. Yes.

16 **Q. What's the URL or the address for Viking**
17 **Investments?**

18 A. It's vikinginvestmentsllc@outlook.com.

19 **Q. When did you set that up?**

20 A. I believe it was April. I cannot read
21 this.

22 **Q. Are you looking at --**

23 A. April 10th of 2019.

24 **Q. Are you looking at Exhibit 10, the**
25 **timeline?**

Page 11

1 A. Yes, the timeline.

2 **Q. I don't know if that's actually -- It's**
3 **actually Exhibit 6, sorry. So why was it that you**
4 **didn't set up the LLC at that time?**

5 A. I was still trying to figure out who was
6 going to be part of it and what we were going to
7 do.

8 **Q. Okay. And in July were you still**
9 **planning on going forward with the business**
10 **venture?**

11 A. Yes.

12 **Q. And still planning on going forward with**
13 **the coffee shop?**

14 A. In July?

15 **Q. Yes.**

16 A. Yes.

17 **Q. How were you going to fund the coffee**
18 **shop?**

19 A. I was going to get a small business loan.

20 **Q. Okay. Did Viking Investments ever**
21 **start a coffee shop?**

22 A. No.

23 **Q. Did it ever apply for an SBA loan?**

24 A. No.

25 **Q. Okay. Had you ever been a member of an**

Page 12

1 **LLC before?**

2 A. Yes.

3 **Q. What was the name of that LLC?**

4 A. That was western travel Explorer, it's
5 WET so Western Explorer Travel.

6 **Q. When was that?**

7 A. Around 2011, when I moved back to Salt
8 Lake.

9 **Q. Did you form that LLC?**

10 A. I did with my mother.

11 **Q. Was that a Montana LLC or a Utah LLC?**

12 A. I think it was Nevada.

13 **Q. And did that LLC actually do business?**

14 A. No, we never got anywhere after setting
15 it up.

16 **Q. Never what?**

17 A. After setting it up we never did
18 anything.

19 **Q. Is it still active?**

20 A. No.

21 **Q. Did you do the paperwork to set up Viking**
22 **Investments?**

23 A. I did.

24 **Q. Okay. And so you say that you set up the**
25 **email regarding Viking Investments in April,**

Page 13

1 **what -- do you have documentation regarding that?**

2 A. I have the welcome email, yes.

3 **Q. Okay. What was the contact that you had**
4 **with Legal Zoom on how to create an LLC?**

5 A. I just looked up how to set up an LLC.

6 **Q. Oh, okay. So you just went to Legal**
7 **Zoom's website?**

8 A. Yeah, uh-huh.

9 **Q. Okay. And you set up a -- or contacted**
10 **USPS to set up a P.O. Box in Montana under Viking**
11 **Investments LLC?**

12 A. Correct.

13 **Q. Did you ever set up that post office box?**

14 A. I did.

15 **Q. In the name of Viking Investments LLC?**

16 A. I think it was Viking Investments LLC and
17 myself.

18 **Q. When did you set up that P.O. Box?**

19 A. I don't have the exact date, but I can
20 provide that.

21 **Q. On your timeline it says April 8th of**
22 **2009 -- or 2019 that you contacted the United**
23 **States Post Office to set up the P.O. Box in**
24 **Montana.**

25 A. It must've been an email, Viking

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<p style="text-align: right;">Page 14</p> <p>1 Investments, because that's what they're all dated 2 for -- yeah, Viking Investments -- so yes, sorry. 3 Q. Okay. But if Viking Investments wasn't 4 formed, you couldn't get a P.O. Box in Viking 5 Investments' name, could've you? 6 A. I thought I did. 7 Q. Okay. What is that P.O. Box? 8 A. It was in Columbia Falls, I don't have 9 the P.O. Box anymore. 10 Q. Okay. I'm going to hand you what we'll 11 mark as Exhibit 13. 12 (Discussion held off the record.) 13 EXHIBITS: 14 (Deposition Exhibit Number 13 marked for 15 identification.) 16 Q. (BY MR. GARDNER) Would you agree with me 17 that that is the Articles of Organization for 18 Viking Investments LLC? 19 A. Yes. 20 Q. Okay. So you applied for one-hour 21 expedited handling; correct? 22 A. Yes. 23 Q. And you had set up the email address and 24 everything months before, what was the urgency of 25 having one-hour handling on July 26th of -- or July</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yep. 2 Q. You said you wanted to build credit for 3 Viking Investments LLC, did you go get credit cards 4 in the name of Viking Investments LLC? 5 A. No, I tried, but... 6 Q. Okay. Did you go apply for any business 7 loans? 8 A. No. 9 Q. Did you pursue opening a coffee shop that 10 you said was the purpose for forming Viking 11 Investments LLC? 12 A. I don't think I understood the question. 13 Q. You said you formed Viking Investments 14 LLC for the purpose of doing a coffee shop. 15 A. Correct. 16 Q. Did you -- after you formed Viking 17 Investments LLC, did you pursue opening that coffee 18 shop? 19 A. No, but I did look at coffee shops. 20 Q. Before you formed Viking Investments LLC; 21 right? 22 A. No, all around the same time. 23 Q. Okay. But you never took any steps 24 towards opening one? 25 A. Correct.</p>
<p style="text-align: right;">Page 15</p> <p>1 25th of 2019? 2 A. I was already up here for my daughter's 3 wedding, and I just wanted to get something set up 4 so I could start building credit and applying for 5 credit for the company. And I opened a bank 6 account the same day. 7 Q. Okay. Opening a bank account doesn't 8 build credit for a company. 9 A. I know. Obviously I know that, I'm 10 not -- 11 Q. Okay. And you had to have it formed to 12 open a bank account, but what was urgent that was 13 happening where you needed one-hour expedited 14 handling? 15 A. I was here for my daughter's wedding. 16 Q. Okay. You did this online; right? 17 A. I did. But I wanted to also open the 18 bank account. 19 Q. Okay. 20 A. And it was with Glacier Bank. 21 Q. Okay. You used the street address of 238 22 North Hilltop Road, Columbia Falls, what is that? 23 A. That's my mother's address. 24 Q. And the postal address, P.O. Box 3223, is 25 that the P.O. Box you were talking about?</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. And you, despite the urgency to build 2 credit and that, you never applied for any loans 3 with Viking Investments? 4 A. Correct. 5 Q. Okay. Has Viking Investments LLC ever 6 engaged in any business activity? 7 A. No. 8 Q. Has it ever engaged in any investment 9 activity? 10 A. Well, the house. 11 Q. So the house, the residence you live in 12 now -- 13 A. Yes. 14 Q. -- that was an investment activity for 15 Viking Investments LLC? 16 A. Initially, yes. 17 Q. Okay. And Viking Investments LLC paid 18 roughly 360-some-thousand-dollars for that house; 19 correct? 20 A. I don't have the exact number off my 21 head -- off hand. 22 Q. Okay. How was that an investment for 23 Viking Investments LLC? 24 A. Because the intention was to flip the 25 house.</p>

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<p style="text-align: right;">Page 18</p> <p>1 Q. Okay. And how quickly did you expect to 2 flip the house? 3 A. Quickly, before the end of the year. 4 Q. While you were still living in Salt Lake? 5 A. Correct. 6 Q. Okay. What changed? 7 A. I got to keep my job, and that's really 8 the only thing that changed. And the house was a 9 lot more work than we initially thought. 10 Q. Okay. So as of January of 2020, you 11 testified that you gave your notice in January of 12 2020 that you were going to quit your job; correct? 13 A. Correct. 14 Q. Okay. And so up until that point you 15 believed you were going to quit your job, and the 16 purpose was for Viking Investments LLC to flip the 17 house as an investment? 18 A. Correct. 19 Q. Okay. And so then in January of 2020, 20 you gave your company notice that you were going to 21 resign; correct? 22 A. Correct. 23 Q. And your company told you, no, we want to 24 keep you, you can work remotely; correct? 25 A. Correct.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. So was the intent all along just to 2 purchase the house in Viking Investments' name and 3 then quitclaim it to you? 4 A. No. 5 Q. Well, you just testified that nothing had 6 changed in that time, yet Viking Investments bought 7 it and then quitclaimed it to you three months 8 later, what changed? 9 A. Money. 10 Q. How so? 11 A. Because I needed money, I had to pay 12 Scott back, I had to pay off some bills. 13 Q. What did you have to pay Scott back? 14 A. Scott and I agreed that I would pay all 15 of his credit card debts and bills. 16 Q. Okay. And all of that was in place when 17 Viking Investments bought the house in September? 18 A. That's correct. 19 Q. What changed between September and 20 December, you knew the amount of money and you knew 21 the bills you had and all of that, what changed to 22 make you quitclaim it to you individually? 23 A. Because I needed to get a loan on the 24 house, and they wouldn't do it in Viking 25 Investments' name.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. And it was at that time when the idea of 2 Viking Investments LLC buying the house as an 3 investment turned to we might use it as our 4 residence; correct? 5 A. Not initially, still, no, we weren't 6 planning on living there. 7 Q. Okay. So you were still thinking about 8 using it -- 9 A. Yes. 10 Q. -- as an investment? 11 Okay. For Viking Investments LLC? 12 A. No, at this time it was in my name. 13 Q. Okay. So Viking Investments LLC never 14 did any real investment activity, then; correct? 15 A. No. 16 Q. Okay. And nothing had really changed in 17 your plans before January of 2020 from when Viking 18 Investments LLC bought the house until January of 19 2020, nothing had really changed because you still 20 thought you were quitting your job; right? 21 A. Correct. 22 Q. Okay. And so Viking Investments LLC 23 bought the house in September and quitclaimed it to 24 you in December? 25 A. Yes.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. Okay. How much money did you put into 2 Viking Investments? 3 A. I have a couple vehicles in Viking 4 Investments, I don't know if that counts. I don't 5 know. So you're asking how much money I put into 6 Viking Investments? 7 Q. Yeah, how much of your own money did you 8 put into Viking Investments? 9 A. The cost of my vehicles, 10 20-something-thousand dollars. 11 Q. When did you put vehicles into Viking 12 Investments? 13 A. I don't know the exact date. I don't 14 know the -- 15 Q. Recently? 16 A. No, it's been years ago. 17 Q. Okay. Why did you put vehicles into 18 Viking Investments? 19 A. Because they were company vehicles. 20 Q. Company vehicles for what? 21 A. For business, I was -- I still intend to 22 use it as a business. 23 Q. You just testified Viking Investments has 24 never done any business. 25 A. That's correct.</p>

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<p style="text-align: right;">Page 22</p> <p>1 Q. Okay. So what business were the vehicles 2 put in there for? 3 A. My intention was and still is to use the 4 company as a business. 5 Q. Okay. What vehicles were put into Viking 6 Investments? 7 A. A Subaru, a Cadillac. 8 Q. Anything else? 9 A. I'm not sure if my fifth wheel is in 10 Viking Investments, I know it's registered to them. 11 Q. The fifth wheel is registered to Viking 12 Investments LLC? 13 A. (Witness nods head.) 14 Q. Okay. When -- any idea when those 15 vehicles were put in there? 16 A. I don't have the exact date in front of 17 me. 18 Q. Okay. I'm going to hand you what we'll 19 mark as Exhibit 14. Well, do you have any idea the 20 year they were put in there? 21 A. No, 2019 or 2020, I just can't remember 22 what exact date. 23 Q. Who did the work -- who did the work to 24 put them into Viking Investments? 25 A. I did.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. No. 2 Q. Was the intent to use it to put Scott's 3 \$400,000 from the trust into? 4 A. Say the question gain. 5 Q. Was Viking Investments LLC formed for the 6 purpose of having a place to put Scott's \$400,000? 7 A. No. 8 Q. No? 9 A. No. 10 Q. It was formed on July 25th of 2019; 11 correct? 12 A. Correct. 13 Q. And Scott's 400,000 was deposited into 14 its bank account on August 2nd, 2019; correct? 15 A. Correct. 16 Q. But the purpose of forming it, doing the 17 expedited formation of the entity and getting a 18 bank account while you were in up there -- while 19 you were in Columbia Falls and Kalispell was not to 20 have a place to put Scott's \$400,000? 21 A. No. 22 Q. Okay. What was the purpose? 23 A. To open a gas station -- or sorry, a 24 coffee shop. Scott was opening a gas station. 25 Q. That was the purpose of Viking</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay. I'm going to hand you what we'll 2 mark as Exhibit 14. 3 EXHIBITS: 4 (Deposition Exhibit Number 14 marked for 5 identification.) 6 A. Where do I put this one? 7 Q. (BY MR. GARDNER) Just right in the pile. 8 A. Okay. 9 Q. What is that document? 10 A. Operating Agreement. 11 Q. Of what? 12 A. Viking Investments. 13 Q. Who put this agreement together? 14 A. It was just a standard form that I filled 15 in the blanks. 16 Q. Who put this agreement together? 17 A. I believe I did. 18 Q. Do you know for certain? 19 A. I do not know for certain. 20 Q. Okay. Could your husband Scott have put 21 this together? 22 A. He could have. 23 Q. So as of July 25th, 2019, when Viking 24 Investments was formed, was the intent to use it to 25 purchase the house?</p>	<p style="text-align: right;">Page 25</p> <p>1 Investments LLC? 2 A. No, mine was a coffee shop. Scott was -- 3 with his \$400,000, he was opening a gas station. 4 Q. Through Viking Investments? 5 A. No. 6 Q. Okay. So my question was the purpose of 7 Viking Investments. 8 A. Coffee shop. 9 Q. Okay. That was never formed; correct? 10 A. Correct. 11 Q. And never really pursued after Viking 12 Investments LLC was formed; correct? 13 A. I don't believe that's correct because 14 when we were up here, Montana Coffee Traders was 15 for sale, and I looked at that. 16 Q. When you were up here right around the 17 time -- 18 A. Yes. 19 Q. You looked at Montana Coffee Traders, you 20 never pursued it; correct? 21 A. Correct. 22 Q. So it was formed on the 25th, you opened 23 a bank account the next day, and seven or eight 24 days later Scott's \$400,000 was in there. But 25 you're telling me when Viking Investments LLC was</p>

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1 formed, the intent was not to put the \$400,000 in
2 there?
3 A. Correct.
4 Q. Scott testified that he decided not to do
5 the gas station, based on your timeline, on
6 July 24th or 25th, so he decided not to do that
7 before the LLC was formed, so what was his -- what
8 was going to be done with the 400,000?
9 A. I don't know.
10 Q. Okay. So your testimony is that when you
11 formed Viking Investments LLC on July 25th of 2019,
12 on an expedited basis so that you could open a bank
13 account while you were in Kalispell, no part of the
14 intention in doing that was to have somewhere to
15 put Scott's \$400,000?
16 A. No, at that time we had not talked about
17 that, no.
18 Q. Okay. So what changed between July
19 25th -- or July 25th or 26th, when you opened the
20 bank account, and August 2nd, when the \$400,000
21 went in there?
22 A. Scott and I talked about different
23 options, after the gas station fell through, on our
24 way home from my daughter's wedding.
25 Q. All right. So before July 25th,

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1 absolutely no intention to put Scott's money into
2 Viking Investments LLC, in the next seven days it
3 switched to the \$400,000 is going into Viking
4 Investments LLC; correct?
5 A. Correct.
6 Q. Okay. Why wasn't Scott a member of
7 Viking Investments LLC?
8 A. Scott and I don't share anything.
9 Q. Okay. So you -- you don't share anything
10 except for the \$400,000 he gave to you?
11 A. Correct.
12 Q. Okay. So what was the discussion in
13 between when you formed this LLC on an expedited
14 basis to get a bank account with no intention of
15 the \$400,000 going in there and August 2nd, when it
16 went in there, what was the discussion that you and
17 Scott had that made you decide to do that?
18 A. Instead of getting a small business loan,
19 borrowing the money from Scott.
20 Q. To start your coffee shop?
21 A. Yes.
22 Q. And so the \$400,000 -- and to be clear,
23 \$400,000 of Scott's money went into Viking
24 Investments' bank account; correct?
25 A. Correct.

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1 Q. And your testimony is that was a loan
2 from Scott?
3 A. Yes.
4 Q. Okay. So Viking Investments -- whatever
5 hasn't been repaid, Viking Investments owes Scott
6 that money; correct?
7 A. Correct.
8 Q. Okay. But Viking Investments doesn't
9 have the money to repay Scott because it used that
10 \$400,000 to buy a house; correct?
11 A. Correct.
12 Q. Okay. I want to back up. So this
13 conversation between July 26th and August 2nd was,
14 okay, I'm going to borrow \$400,000 from you and so
15 you're going to put your money into Viking
16 Investments so I don't have to get an SBA loan so I
17 can start my coffee company; correct?
18 A. It wasn't just a coffee company, that was
19 my goal at the time, but it was any investment that
20 I could earn money on, yes.
21 Q. And after the \$400,000 went into your
22 account, Viking's account, you did zero to try and
23 pursue a coffee shop; correct?
24 A. No, I don't believe that's true.
25 Q. What did you do after the \$400,000 went

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1 into there to pursue a coffee shop?
2 A. I looked at tons of different options to
3 invest the money.
4 Q. When?
5 A. I don't have the dates in front of me.
6 Q. Okay. What options did you look at?
7 A. We -- I looked at houses, I looked at
8 other coffee shops, I looked at rental properties.
9 Q. Okay. When did you look at those
10 properties?
11 A. When about I found the house, September
12 something.
13 Q. You didn't find the house until
14 September?
15 A. Correct.
16 Q. Okay. So up until September there was a
17 couple months when the money was in Viking's
18 account when you were looking at coffee shops and
19 investments and things?
20 A. Correct.
21 Q. Okay. So I'm going to hand you
22 Exhibit 15.
23 EXHIBITS:
24 (Deposition Exhibit Number 15 marked for
25 identification.)

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IN RE: WILLIAMS, DEBTOR

9/14/2023

CANDY WILLIAMS

<p style="text-align: right;">Page 30</p> <p>1 Q. (BY MR. GARDNER) Exhibit 15 is the 2 closing statement from Viking Investments' purchase 3 of the house at 11423 Spotted Fawn Lane, Bigfork; 4 correct? 5 A. Correct. 6 Q. Okay. And the purchase price was 7 \$358,000; correct? 8 A. Correct. 9 Q. And Viking Investments put a \$10,000 10 deposit on the house that was received by the title 11 company on August 26th of 2019; correct? 12 A. Correct. 13 Q. Okay. August 2nd, Viking gets the money 14 with the intent of buying a coffee shop, then looks 15 at other investments and the money's a loan from 16 Scott; right? 17 A. Essentially, yes. 18 Q. Okay. And -- well, I mean, I assume you 19 looked at the house before Viking Investments put a 20 deposit on it; correct? 21 A. Yes, I believe -- I don't know the exact 22 date, but it was really quick because of the price. 23 I looked at it when I was here for my daughter's 24 wedding. 25 Q. And that was in late July?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. The week of her wedding. 2 Q. Okay. So you were up here for a week, 3 and most of that would've been before her wedding, 4 getting ready for the wedding; correct? 5 A. That's correct. 6 Q. And so you would've looked at this house 7 in Bigfork sometime before your daughter's wedding? 8 A. I don't know if it was before or after, 9 but the same week, yes. 10 Q. And before you went and looked at the 11 house, you would've had to have made a decision 12 that, oh, we're not gonna do a coffee shop, we're 13 going to look for a house instead; correct? 14 A. No, I was looking at a lot of different 15 options. 16 Q. Okay. In any event, by August 26th you 17 had put a \$10,000 down payment down on the house -- 18 or Viking Investments LLC had put the down payment 19 down, and that's the same house that you and your 20 husband live in now; correct? 21 A. Correct. 22 Q. Okay. And that \$10,000 that was put down 23 on the house came from the money that, according to 24 Scott, he transferred to Viking Investments, I 25 believe your testimony is that was a loan that had</p>
<p style="text-align: right;">Page 31</p> <p>1 A. No. 2 Q. When was that? 3 A. I don't have that date in front of me. 4 Q. You don't know? 5 A. I don't -- no, I don't. Off the top of 6 my head I don't know what day she got married. I 7 want to say -- I don't know. She's divorced now, 8 so it's hard to keep track. 9 Q. Early August? 10 A. I don't know. I don't recall. 11 Q. On a break can you check and find out 12 when your daughter was married? 13 A. Absolutely. 14 Q. Okay. When you were up here, how long 15 were you up here for your daughter's wedding? 16 A. The first time we were up here looking at 17 venues in July. 18 Q. Okay. 19 A. And then the second time we were up here 20 probably a week -- 21 Q. Okay. 22 A. -- for her actual wedding week. 23 Q. So whenever you -- did you look at this 24 house in Bigfork when you were up here looking for 25 wedding venues or the week of her wedding?</p>	<p style="text-align: right;">Page 33</p> <p>1 to be repaid? 2 A. I'm saying loan because there were 3 intentions behind it, but it's not like an actual 4 written loan agreement, but there were conditions, 5 I guess. 6 Q. Okay. So it was Scott's \$400,000, and he 7 transferred it to Viking on 8/2/19; agreed? 8 A. Agreed. 9 Q. And when Scott transferred that to 10 Viking, Viking gave him nothing in return at that 11 time; correct? 12 A. On the day of the transfer? 13 Q. Yes. 14 A. No. 15 Q. And Viking did not enter into any loan 16 agreement or promissory note with Scott; correct? 17 A. Correct. 18 Q. And there was nothing in writing 19 requiring Viking Investments to ever give that 20 money -- any of that money back to Scott; correct? 21 A. Correct. 22 Q. And in fact, within a couple months, 23 Viking Investments had spent 368 -- or \$359,000 of 24 that money buying a house which it titled in Viking 25 Investments LLC; correct?</p>

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IN RE: WILLIAMS, DEBTOR

9/14/2023

CANDY WILLIAMS

<p style="text-align: right;">Page 34</p> <p>1 A. Correct.</p> <p>2 Q. And after it bought the house, Viking</p> <p>3 Investments didn't give Scott a mortgage on it or</p> <p>4 anything to evidence that it owed Scott a lot of</p> <p>5 money; correct?</p> <p>6 A. I did start -- Viking Investments</p> <p>7 actually paid Scott I think a couple days after</p> <p>8 that.</p> <p>9 Q. There are a few times in there Viking</p> <p>10 Investments gave \$2500 --</p> <p>11 A. Yes.</p> <p>12 Q. -- correct?</p> <p>13 A. Yes.</p> <p>14 Q. And if Scott hadn't given all of his</p> <p>15 money to Viking Investments, there would've been no</p> <p>16 reason to ask Viking Investments for money;</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. And likewise, if Scott hadn't given all</p> <p>20 of his money to Viking Investments, he could've</p> <p>21 paid his own bills; correct?</p> <p>22 A. Correct.</p> <p>23 Q. He could've paid off his credit cards;</p> <p>24 correct?</p> <p>25 A. (Witness nods head.)</p>	<p style="text-align: right;">Page 36</p> <p>1 completely stressed from his dad's divorce</p> <p>2 situation, and he wanted to take a break and not do</p> <p>3 anything for awhile. So he was going to buy the</p> <p>4 gas station, he was very committed to it, he didn't</p> <p>5 want me to buy the house, so...</p> <p>6 Q. I get all of that, but none of that</p> <p>7 explains why he had to get the money out of his</p> <p>8 name.</p> <p>9 A. Yeah, I understand the question. I don't</p> <p>10 have an answer.</p> <p>11 Q. What was the urgency to get the money out</p> <p>12 of Scott's name?</p> <p>13 A. There wasn't -- to my knowledge there's</p> <p>14 not an urgency, other than we found this property.</p> <p>15 Q. Which Scott could've bought in his own</p> <p>16 name?</p> <p>17 A. He could have.</p> <p>18 Q. But neither you nor Scott wanted the</p> <p>19 house to be in Scott's name, did you?</p> <p>20 A. I don't think we talked about it being in</p> <p>21 his name.</p> <p>22 Q. So in December the house -- Viking</p> <p>23 Investments, who you're the sole member of;</p> <p>24 correct?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. He could've done whatever he wanted with</p> <p>2 it; correct?</p> <p>3 A. Yes.</p> <p>4 Q. He could have, for example, bought a</p> <p>5 house; correct?</p> <p>6 A. He could've.</p> <p>7 Q. There was nothing preventing Scott from</p> <p>8 using that \$400,000 to buy the house that was</p> <p>9 bought a month after the money was transferred and</p> <p>10 put into Viking Investments' name, he could've</p> <p>11 bought it with his \$400,000; correct?</p> <p>12 A. Correct.</p> <p>13 Q. And instead, Viking Investments bought it</p> <p>14 with Scott's \$400,000; correct?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. So help me with this. Because of</p> <p>17 that, the fact that Scott could've bought the house</p> <p>18 in his name, Scott wouldn't have needed Viking</p> <p>19 Investments to give him \$2500, if he hadn't</p> <p>20 transferred the money, Scott could've paid off his</p> <p>21 own credit cards. I'm confused as to what the</p> <p>22 possible purpose of doing it that way was, can you</p> <p>23 explain that to me?</p> <p>24 A. So part of our conversation was Scott had</p> <p>25 worked his butt off and had a heart attack and was</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. Quitclaimed the house to you</p> <p>2 individually; correct?</p> <p>3 A. Correct.</p> <p>4 Q. What did you give Viking Investments for</p> <p>5 that transfer?</p> <p>6 A. I did not give Viking Investments</p> <p>7 anything.</p> <p>8 Q. Okay. I'm going to hand you what we'll</p> <p>9 mark as Deposition Exhibit 16.</p> <p>10 EXHIBITS:</p> <p>11 (Deposition Exhibit Number 16 marked for</p> <p>12 identification.)</p> <p>13 A. Yeah.</p> <p>14 Q. (BY MR. GARDNER) That's a copy of the</p> <p>15 quitclaim deed from Viking Investments to you;</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. And it says For Value Received, but in</p> <p>19 reality there was no value exchanged between you</p> <p>20 and Viking; correct?</p> <p>21 A. Correct.</p> <p>22 Q. And this was dated December 27 of 2019;</p> <p>23 correct?</p> <p>24 A. 26th.</p> <p>25 Q. Oh, I'm sorry, I was looking at the</p>

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IN RE: WILLIAMS, DEBTOR

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CANDY WILLIAMS

<p style="text-align: right;">Page 38</p> <p>1 recorded date. Yeah, the date that -- and by the 2 way, you signed it on behalf of Viking Investments 3 LLC; correct? 4 A. Yes. 5 Q. And so you signed it on December 26th, it 6 just wasn't recorded until December 27th. 7 A. Okay. 8 Q. Okay. So the house was quitclaimed from 9 Viking to you before the stuff in January about you 10 giving up your job and then finding out you could 11 keep the job, which you said changed what the plans 12 were; correct? 13 A. Correct. 14 Q. So why was it, again, that the house was 15 transferred to your name individually? 16 A. Money. 17 Q. Explain that to me. 18 A. I needed to get money to fix the house. 19 I needed to get money to pay off Scott's credit 20 cards. And they wouldn't do it in Viking 21 Investments' name, that's the only reason it's 22 still not in Viking Investments' name. 23 Q. Okay. And so the two reasons you needed 24 money were to fix the house and pay off Scott's 25 credit cards; correct?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. But the reason for the refinance was 2 primarily to fix up the house and pay off Scott's 3 credit card debt? 4 A. And mine, too. 5 Q. Okay. I'm going to hand you what we'll 6 mark as Exhibit 17. 7 EXHIBITS: 8 (Deposition Exhibit Number 17 marked for 9 identification.) 10 Q. (BY MR. GARDNER) And this is the loan 11 application you filed -- you filled out in December 12 of 2019 to apply for the \$200,000 mortgage you 13 wanted to get on the home; correct? 14 A. Correct. 15 Q. Okay. And do you see a date on this 16 application, it looks like you signed it on 17 December 26th, 2019; correct? 18 A. Yes. 19 Q. Okay. And starting on page 2 there's a 20 list of your various debt; do you see that? 21 A. Yes. 22 Q. Okay. And the first one is America First 23 Credit, and there's a balance of \$41,975; do you 24 see that? 25 A. Yep.</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Correct. 2 Q. You didn't use any of that money to pay 3 off your credit card debt? 4 A. Yes, I did. 5 Q. So another reason was to pay off your 6 credit card debt; correct? 7 A. Yes. 8 Q. You had a very large amount of credit 9 card debt, didn't you? 10 A. No. 11 Q. No? More than 10,000? 12 A. Yes. 13 Q. More than 20,000? 14 A. Not in credit cards, no. 15 Q. What other debt did you have in December 16 2019? 17 A. I had a payment on my fifth wheel. 18 Q. Okay. How much? 19 A. And my car. 20 Q. Okay. You had quite a bit on the fifth 21 wheel and on the car; correct? 22 A. Correct. 23 Q. And so you had credit card debt, fifth 24 wheel debt and your car debt; correct? 25 A. Correct.</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. What is that debt for? 2 A. Fifth wheel. 3 Q. And whose name is that fifth wheel in? 4 A. Mine. 5 Q. Okay. The next one is Wells Fargo Dealer 6 Services for 13,671; do you see that? 7 A. Yes. 8 Q. And what is that for? 9 A. That's my car. 10 Q. Okay. And whose name is that car in? 11 A. Mine. 12 Q. Okay. Is that the Cadillac? 13 A. Yes. 14 Q. So at that time those cars were in your 15 name individually? 16 A. Yes. 17 Q. Okay. So when was that they were 18 transferred into Viking? 19 A. I'd have to find a date for you. 20 Q. Okay. The next one is American Express 21 of 9,677; correct? 22 A. Correct. 23 Q. Is that a solely your American Express 24 account? 25 A. No, that's solely Scott's.</p>

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IN RE: WILLIAMS, DEBTOR

9/14/2023

CANDY WILLIAMS

<p style="text-align: right;">Page 42</p> <p>1 Q. Solely Scott's? 2 A. Yes. 3 Q. Is that an American Express that's in 4 Scott's name that you also have a card for that you 5 spend money on? 6 A. I have a -- what is it called, spouse 7 card. 8 Q. Okay. So that's an American Express that 9 you charged things to and you spend money on; 10 correct? 11 A. Occasionally. 12 Q. Yeah. And so you're on that account as 13 well and you have a card on that account? 14 A. I do not any longer. 15 Q. Okay. At that time you did? 16 A. Yes. 17 Q. And the \$17,000 -- Remember Scott 18 testifying about the \$25,000 -- 19 A. Yes. 20 Q. -- from the trust that went to -- \$17,000 21 of that went to pay down an American Express 22 account? 23 A. Yes. 24 Q. That went to pay down an American Express 25 that you had a card on, and a lot of the money</p>	<p style="text-align: right;">Page 44</p> <p>1 account? 2 A. Yes. 3 Q. And do you agree with me that you also 4 had a card on this account and charged money to 5 this account? 6 A. Yes. 7 Q. Okay. And by the way, looking back at 8 Exhibit 17 -- 9 A. Which one is that? 10 Q. That is your application for your credit. 11 A. Uh-huh. 12 Q. You are signing that under penalty of 13 perjury; correct? 14 A. What? 15 Q. An application for credit to a bank, 16 you're declaring that your statements are true and 17 correct; right? 18 A. Yes. 19 Q. Okay. And the only creditor, the only 20 person applying for a loan here is you, Candy 21 Williams; correct? 22 A. Correct. 23 Q. And so on page 2, when it starts the list 24 of liabilities of the creditor, you are telling the 25 bank that you are liable for every one of these</p>
<p style="text-align: right;">Page 43</p> <p>1 owing was money you had charged; correct? 2 A. No, I don't believe that's true. 3 Q. I'm going to mark this as Exhibit 18. 4 EXHIBITS: 5 (Deposition Exhibit Number 18 marked for 6 identification.) 7 Q. (BY MR. GARDNER) And this is an American 8 Express Platinum card in Scott Williams' name; 9 correct? 10 A. Correct. 11 Q. And if you look on the third page there's 12 a payment of \$17,992; correct? 13 A. The second page? 14 Q. Yes, top of Payments and Credits. 15 A. Yep. 16 Q. And if you look at Exhibit 1, I can't 17 find my copy of Exhibit 1, but Exhibit 1 is an 18 American Express statement, and do you agree 19 there's a payment to American Express for \$17,992 20 on it, if you -- 21 A. Yes. 22 Q. Okay. So do you agree with me this is 23 the account that the payment -- the American 24 Express account that the payment was made on from 25 when Scott transferred the \$25,000 to the U.S. Bank</p>	<p style="text-align: right;">Page 45</p> <p>1 debts you've listed; correct? 2 A. Yes. 3 Q. Okay. So on page 3, the next four, 4 there's a JPMCB - Card Service, there's a JPMCB 5 card, there's a Comenitybank/Victoria, a Chevron 6 PLLC, then there's 4,000, 3,000, 2,000, 2,000, 7 you're telling the bank that you owe that money; 8 correct? 9 A. Where does that say that? Because I 10 thought these were just a list of things on my 11 credit record. 12 Q. It says Assets and Liabilities, list of 13 creditors, name -- well, you're doing a credit app, 14 if you're not responsible for the liabilities that 15 you're listing, why would you put them on an 16 application? 17 A. I didn't put them on this application, 18 this was done by the mortgage company. 19 Q. Okay. So let's start on the top of 20 page 3, the JPMCB Card Service for \$4,256, is that 21 you? 22 A. I do not know if that's mine or Scott's. 23 Q. Okay. Well, if your name is not at least 24 on the account, it won't show up on your credit 25 report, would it?</p>

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IN RE: WILLIAMS, DEBTOR

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CANDY WILLIAMS

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<p>1 A. I was a cardholder.</p> <p>2 Q. Okay. So you were -- at minimum you were</p> <p>3 a cardholder on that account?</p> <p>4 A. Correct.</p> <p>5 Q. Next one, the next JPMCB Card?</p> <p>6 A. Same, I think that's Scott's, but I'm not</p> <p>7 positive.</p> <p>8 Q. But you would've been a cardholder?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. The next one, the Comenitybank?</p> <p>11 A. Yeah, that's mine.</p> <p>12 Q. Okay. The Chevron one?</p> <p>13 A. Scott's, cardholder.</p> <p>14 Q. You were a cardholder as well?</p> <p>15 All right. Let's go back two pages,</p> <p>16 another JPMCB card for 2,200?</p> <p>17 A. Yeah, I don't know if that one's mine or</p> <p>18 Scott's.</p> <p>19 Q. Okay. Ulta card?</p> <p>20 A. Mine.</p> <p>21 Q. Old Navy?</p> <p>22 A. Mine. Mine.</p> <p>23 Q. Okay. Just tell me if any of those below</p> <p>24 that are not yours.</p> <p>25 A. I'm not sure about the Wells Fargo one or</p>	<p>1 A. Correct.</p> <p>2 Q. And then if you look at page 2, the</p> <p>3 amounts that were paid directly from the title</p> <p>4 company from the proceeds of that loan, there was</p> <p>5 41,975 to American First Credit Union; correct?</p> <p>6 A. That's mine, yes.</p> <p>7 Q. And that was for your fifth wheel that's</p> <p>8 titled in your name; correct?</p> <p>9 A. Correct.</p> <p>10 Q. And there was 13,671 to American First</p> <p>11 Credit Union; correct?</p> <p>12 A. Correct.</p> <p>13 Q. Or to Wells Fargo Dealer Services.</p> <p>14 A. Yeah, sorry, yes.</p> <p>15 Q. And that is for the Cadillac, to pay that</p> <p>16 off; correct?</p> <p>17 A. Correct.</p> <p>18 Q. And so that was paid off with funds from</p> <p>19 this mortgage, and that is in your name; correct?</p> <p>20 A. Correct.</p> <p>21 Q. The payoff to American Express of \$9,677,</p> <p>22 whose American Express account was that?</p> <p>23 A. That's Scott's.</p> <p>24 Q. That you also had a card and spent money</p> <p>25 on; correct?</p>
Page 47	Page 49
<p>1 the First Premier one.</p> <p>2 Q. Okay.</p> <p>3 A. Or the JP Morgan.</p> <p>4 Q. So Wells Fargo was \$1,100, the JPMCB with</p> <p>5 700, or which other one did you say?</p> <p>6 A. The Wells Fargo, the First Premier.</p> <p>7 Q. Okay.</p> <p>8 A. Some of these we both had accounts, so I</p> <p>9 don't -- I don't know off the top of my head which</p> <p>10 ones were which.</p> <p>11 Q. Okay. I'm going to hand you what we'll</p> <p>12 mark as Exhibit 19.</p> <p>13 EXHIBITS:</p> <p>14 (Deposition Exhibit Number 19 marked for</p> <p>15 identification.)</p> <p>16 (Discussion held off the record.)</p> <p>17 Q. (BY MR. GARDNER) So you have Exhibit 19</p> <p>18 in front of you; correct?</p> <p>19 A. Correct.</p> <p>20 Q. And Exhibit 19 is the closing statement</p> <p>21 from when you took out the loan and had a mortgage</p> <p>22 placed on the Bigfork property; correct?</p> <p>23 A. Correct.</p> <p>24 Q. And you took out a \$200,000 loan;</p> <p>25 correct?</p>	<p>1 A. Correct.</p> <p>2 Q. Okay. Payoff to JPMCB?</p> <p>3 A. Scott's.</p> <p>4 Q. That you also had a card?</p> <p>5 A. I've had a card but I didn't charge on</p> <p>6 it.</p> <p>7 Q. Okay. Do you know whether you are liable</p> <p>8 for those funds?</p> <p>9 A. No, none of these, they've all been</p> <p>10 removed off my credit.</p> <p>11 Q. So your testimony is -- Well, let me ask</p> <p>12 you this.</p> <p>13 In order to get this loan, the mortgage</p> <p>14 company required you to pay down some of your debt</p> <p>15 out of the proceeds in order to qualify for the</p> <p>16 loan?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. So they required you to pay off</p> <p>19 the American First Credit Union for your fifth</p> <p>20 wheel; correct?</p> <p>21 A. Yes.</p> <p>22 Q. And they required you to pay off Wells</p> <p>23 Fargo for your Cadillac; correct?</p> <p>24 A. Correct.</p> <p>25 Q. And that was for the purpose of getting</p>

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<p style="text-align: right;">Page 50</p> <p>1 your other debt down low enough so that you 2 qualified for the loan? 3 A. Correct. 4 Q. So you believe that you weren't liable on 5 those two accounts, even though they were paid off 6 out of closing, which to me indicates that was 7 liability of yours that had to be paid off to bring 8 down your debt to income ratio? 9 MR. MURPHY: I'll object as 10 argumentative. Take your best shot at answering 11 the question. 12 MR. GARDNER: It was a very bad question. 13 I sustain your objection. {Laughter.} 14 THE WITNESS: So do I answer or no? 15 MR. GARDNER: No, you don't, no you 16 don't. 17 THE WITNESS: Okay. It's confusing for 18 me, too. 19 Q. (BY MR. GARDNER) Yeah, to me that 20 indicated that you must've been liable for them, 21 also, but if you don't know, that's fine. 22 A. Okay. 23 Q. I'm just going to mark this really quick 24 and then we'll let you take a break. 25 A. Okay.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Did you contact anybody about those 2 coffee shops? 3 A. No. 4 Q. So what did your investigation consist 5 of? 6 A. I just was looking at like buying one of 7 those little -- I did look at Montana Coffee 8 Traders, but that went quick because it was super 9 cheap. I looked at wholesalers. 10 Q. Let me interrupt you. When you say you 11 looked at Montana Coffee Traders, what did you do? 12 A. I looked at the -- there was a business 13 website kind of like Realtor.com, but it's a 14 business website, I looked through that, but that 15 was already really quickly under contract. 16 Q. Okay. So Montana Coffee Traders, you 17 looked at an ad? 18 A. Yes. 19 Q. Okay. What else did you do in 20 investigating this coffee business? 21 A. I put menus together. I put different 22 flavors. We were going -- my daughter and I were 23 going back and forth with names. In Salt Lake we 24 went to the wholesalers place and looked at costs. 25 I looked at trailers, too, to do like the pop-up --</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. Just so we have it in the list documents, 2 I'm handing you Exhibit 20. 3 EXHIBITS: 4 (Deposition Exhibit Number 20 marked for 5 identification.) 6 Q. (BY MR. GARDNER) Can you just confirm 7 for me that that is a copy of the trust indenture 8 that was placed on the property as part of this 9 \$200,000 loan in December of 2019? 10 A. Correct. 11 MR. GARDNER: Okay. Let's go off the 12 record and take a ten-minute break. 13 (Whereupon, the proceedings were in 14 recess at 3:51 p.m. and subsequently reconvened at 15 4:06 p.m., and the following proceedings were 16 entered of record:) 17 Q. (BY MR. GARDNER) So just to be clear, 18 when Viking Investments LLC was formed, you didn't 19 have a plan to buy a house; correct? 20 A. Correct. 21 Q. When you were looking at coffee shops and 22 you said you looked at Montana Coffee Traders and 23 things like that, were you using a business broker 24 or a Realtor or anything? 25 A. No.</p>	<p style="text-align: right;">Page 53</p> <p>1 I don't know what they're called, like where you 2 park a trailer and they serve you coffee, those. 3 Q. In Salt Lake? 4 A. No, online, I looked at those online. 5 Q. You looked at those online? 6 A. Yes, and just different properties and 7 opportunities online of the area where I could do 8 it. 9 Q. Okay. You never actually talked to 10 somebody about the coffee business or -- 11 A. No. 12 Q. -- hired a consultant or went and visited 13 actual businesses and met with the owners or 14 anything like that; correct? 15 A. Correct. 16 Q. And in Kalispell, Columbia Falls, 17 Bigfork, you never met with anybody about a coffee 18 business there; correct? 19 A. Correct. 20 Q. You never talked to any landowners about 21 placing a coffee business on their property; 22 correct? 23 A. Correct. 24 Q. You never looked at sheds or buildings 25 for coffee businesses; correct?</p>

IN RE: WILLIAMS, DEBTOR

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CANDY WILLIAMS

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1 A. Correct.
 2 **Q. Okay. And so you never had a Realtor for**
 3 **the purpose of the coffee business; correct?**
 4 A. Correct.
 5 **Q. Did -- did you -- when you bought the**
 6 **house, who was your Realtor?**
 7 A. I didn't have a Realtor, I just called an
 8 ad online, and whoever answered the phone -- it was
 9 Chuck Olson's -- somebody at their office in
 10 Kalispell.
 11 **Q. So you called whoever had the listing?**
 12 A. Yes.
 13 **Q. Did they act as a dual broker for you --**
 14 **for Viking on the closing of the property?**
 15 A. Dual broker?
 16 **Q. Did they represent the buyer and the**
 17 **seller?**
 18 A. No.
 19 **Q. Okay. So you didn't call the person who**
 20 **had the Bigfork home listed; correct?**
 21 A. Like individually?
 22 **Q. Yeah.**
 23 A. No. You know how they -- like Chuck
 24 Olson will list a million properties, I just called
 25 the number on that property and whoever answered

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1 the phone is who we dealt with to purchase the
 2 property.
 3 **Q. Okay. And when you say that property,**
 4 **you found the ad for the property that Viking ended**
 5 **up purchasing online; correct?**
 6 A. Correct.
 7 **Q. And you looked at the Realtor who had**
 8 **that property listed and called that Realtor?**
 9 A. Correct.
 10 **Q. Okay. So you -- and you hired somebody**
 11 **at Chuck Olson to be your broker for closing it, or**
 12 **did you use a broker?**
 13 A. I didn't use a broker.
 14 **Q. Okay. How many times did you look at the**
 15 **house in Bigfork before --**
 16 A. One time.
 17 **Q. -- before Viking bought it?**
 18 **And who went to look at it?**
 19 A. Me and Scott did.
 20 **Q. Okay. And who did you go -- what Realtor**
 21 **did you go with to look at it?**
 22 A. The person from Chuck Olson --
 23 **Q. Chuck Olson?**
 24 A. -- met us there, yes.
 25 **Q. It was a she, the Realtor at Chuck Olson?**

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1 A. It was.
 2 **Q. What was her name?**
 3 A. I want to say it's Joyce.
 4 **Q. Oh, it's probably on the documents;**
 5 **right? I can look later.**
 6 **Okay. And how long do you think it was**
 7 **between when you looked at -- Let me back up.**
 8 **At the end of July, when you were -- you**
 9 **said you were up here looking for venues for your**
 10 **daughter's wedding?**
 11 A. Correct.
 12 **Q. Okay. Was -- and your daughter got**
 13 **married in August; right?**
 14 A. Correct.
 15 MR. MURPHY: We figured out the date, by
 16 the way.
 17 **Q. (BY MR. GARDNER) Oh, I'll ask you, what**
 18 **was the date of your daughter's wedding?**
 19 A. August 10th.
 20 **Q. August 10th, okay. So at the end of**
 21 **July, like July -- so were you up here from**
 22 **July 24th through August 10th?**
 23 A. Oh, no.
 24 **Q. No? So at the end of July was Scott up**
 25 **here with you?**

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1 A. Yes.
 2 **Q. Did Scott go into Glacier Bank with you**
 3 **to open up Viking Investments' account?**
 4 A. Yes.
 5 **Q. Why?**
 6 MR. WILLIAMS: It was hot outside.
 7 A. I don't know why.
 8 **Q. (BY MR. GARDNER) Who chose Glacier Bank?**
 9 A. Me, I banked with them before.
 10 **Q. And when did you open up that account, do**
 11 **you remember?**
 12 A. July 25th.
 13 **Q. I'm going to hand you what we'll mark as**
 14 **Exhibit 21.**
 15 **EXHIBITS:**
 16 (Deposition Exhibit Number 21 marked for
 17 identification.)
 18 **Q. (BY MR. GARDNER) And that is a bank**
 19 **account statement for the Glacier Bank account for**
 20 **Viking Investments LLC; correct?**
 21 A. Yes.
 22 **Q. And it looks like the opening deposit was**
 23 **made on July 25th; correct?**
 24 A. Correct.
 25 **Q. Okay. And \$100 was put in there;**

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<p style="text-align: right;">Page 58</p> <p>1 correct?</p> <p>2 A. That's correct.</p> <p>3 Q. Other than that -- well, whose hundred</p> <p>4 dollars was that?</p> <p>5 A. It was my hundred dollars.</p> <p>6 Q. Other than that hundred dollars did you</p> <p>7 ever put any other cash or money into Viking</p> <p>8 Investments' bank account?</p> <p>9 A. Since then?</p> <p>10 Q. Yes.</p> <p>11 A. Yes.</p> <p>12 Q. When?</p> <p>13 A. Recently.</p> <p>14 Q. How recently?</p> <p>15 A. A week ago. I keep looking for my phone.</p> <p>16 Q. Okay. So you put some money in Viking</p> <p>17 Investments' account a week ago?</p> <p>18 A. Yeah.</p> <p>19 Q. Prior to that you had never put any --</p> <p>20 A. No.</p> <p>21 Q. -- money in --</p> <p>22 In fact, the bank account had never been</p> <p>23 used for anything other than the hundred dollars</p> <p>24 and the \$400,000 of Scott's money that was put in</p> <p>25 there; correct?</p>	<p style="text-align: right;">Page 60</p> <p>1 to find a date, I don't know off the top of my</p> <p>2 head.</p> <p>3 Q. You merged what two accounts?</p> <p>4 A. Online, I'm talking about online. So I</p> <p>5 had to log into Viking Investments separately</p> <p>6 versus my own personal account, they merged them</p> <p>7 together online, now online when I make a deposit</p> <p>8 online, it automatically goes into Viking's</p> <p>9 account, then I have to take it back out of Viking</p> <p>10 Investments.</p> <p>11 Q. At Glacier Bank?</p> <p>12 A. Yes, yes.</p> <p>13 Q. Is Glacier Bank your only bank now?</p> <p>14 A. No.</p> <p>15 Q. Do you still have the American --</p> <p>16 A. Yes.</p> <p>17 Q. -- First bank account?</p> <p>18 A. Uh-huh.</p> <p>19 Q. What other bank account -- do you have a</p> <p>20 personal bank account at Glacier Bank?</p> <p>21 A. I do.</p> <p>22 Q. So now all of your paychecks go into</p> <p>23 Viking Investments LLC?</p> <p>24 A. No, just what I -- not through, just when</p> <p>25 they go into like Viking automatically.</p>
<p style="text-align: right;">Page 59</p> <p>1 A. No, it was my main account for a long</p> <p>2 time, for awhile.</p> <p>3 Q. Viking Investments' account was?</p> <p>4 A. Yes.</p> <p>5 Q. You just told me that you never put any</p> <p>6 money into Viking Investments' account other than</p> <p>7 this hundred dollars.</p> <p>8 A. No, I said a couple of weeks ago I put</p> <p>9 money in there. I have put money in there since</p> <p>10 then, multiple times; the account's still open.</p> <p>11 Q. When have you put money in it?</p> <p>12 A. Multiple times.</p> <p>13 Q. I've asked you in discovery for all of</p> <p>14 Viking Investments' bank accounts and I was given</p> <p>15 certain ones --</p> <p>16 A. Okay.</p> <p>17 Q. -- and I was given no others.</p> <p>18 So what else have you used Viking</p> <p>19 Investments' bank account for?</p> <p>20 A. That -- here -- what happens is, because</p> <p>21 that was originally my account online, when I</p> <p>22 deposit a check online, it goes into Viking's</p> <p>23 account.</p> <p>24 Q. Since when?</p> <p>25 A. Since I merged my two accounts. I'd have</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. For how long?</p> <p>2 A. Awhile, I couldn't -- I don't know off</p> <p>3 the top of my head, it's been awhile.</p> <p>4 Q. What were you talking about depositing</p> <p>5 money into Viking Invest --</p> <p>6 A. That's what -- that's what I did.</p> <p>7 Q. How long have you been doing that for?</p> <p>8 A. I'd say year, I don't know off the top of</p> <p>9 my head.</p> <p>10 Q. Why did you merge your personal account</p> <p>11 at Glacier Bank with the Viking Investments LLC</p> <p>12 bank account?</p> <p>13 A. I didn't merge them, I'm just talking</p> <p>14 about online access. Like when I go into the app</p> <p>15 with Glacier Bank, I had to go into two different</p> <p>16 accounts, and Glacier Bank put them into one online</p> <p>17 access so I can view all of my accounts.</p> <p>18 Q. One online --</p> <p>19 A. Yes.</p> <p>20 Q. -- portal?</p> <p>21 A. Yes, yes.</p> <p>22 Q. Okay. But when you make a deposit, it</p> <p>23 doesn't go into the Viking Investments LLC bank</p> <p>24 account, it goes into your personal account;</p> <p>25 correct?</p>

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1 A. No, it goes into Viking Investments LLC.
 2 **Q. Okay. Will you supplement your discovery**
 3 **and give me all of Viking Investments LLC's bank**
 4 **account statements up to the present date?**
 5 A. Of course.
 6 **Q. Okay. Because what I was given and**
 7 **understood from the discovery responses show no**
 8 **deposits into Viking Investments LLC other than the**
 9 **initial \$100 and the \$400,000 from Scott.**
 10 A. Okay.
 11 **Q. But your testimony still is that Viking**
 12 **Investments LLC has never been used for any**
 13 **business purpose or any purpose other than buying**
 14 **that house and then transferring it to you;**
 15 **correct?**
 16 A. Correct.
 17 **Q. Okay. So back to the end of July, you**
 18 **formed Viking Investments LLC on the 25th, you**
 19 **opened the Glacier Bank account on the 25th, you**
 20 **were in Kalispell or Columbia Falls with Scott;**
 21 **correct?**
 22 A. Correct.
 23 **Q. And your daughter got married on**
 24 **August 10th; correct?**
 25 A. Correct.

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1 **Q. When did you go back to Salt Lake after**
 2 **July 25th?**
 3 A. July 27th.
 4 **Q. Okay. July 27th, you and Scott went back**
 5 **to Salt Lake?**
 6 A. Correct.
 7 **Q. Okay. And when did you and Scott come**
 8 **back to the Flathead?**
 9 A. August 4th.
 10 **Q. So Viking Investments' account is at**
 11 **Glacier Bank. When Scott deposited the \$400,000,**
 12 **did he have Zions Bank just do an electronic**
 13 **transfer or was that check personally deposited**
 14 **into Viking Investments' account?**
 15 A. I believe it was a cashier's check.
 16 MR. WILLIAMS: Yeah, if it helps, you put
 17 it in the bank on the 5th.
 18 THE WITNESS: Yeah.
 19 **Q. (BY MR. GARDNER) All right, I apologize,**
 20 **let's make that an exhibit.**
 21 **EXHIBITS:**
 22 (Deposition Exhibit Number 22 marked for
 23 identification.)
 24 **Q. (BY MR. GARDNER) Okay. Exhibit 22, that**
 25 **is another Viking Investments bank account**

1 **statement from Glacier Bank, and that is the one**
 2 **for August; correct?**
 3 A. August, correct.
 4 **Q. Okay. So you went -- you and Scott drove**
 5 **back to Salt Lake from the Flathead on the 27th;**
 6 **correct?**
 7 A. Correct, we actually flew.
 8 **Q. Oh, you flew?**
 9 A. Yes.
 10 **Q. Okay. So you got back to Salt Lake and**
 11 **Scott went to Zions Bank and got the cashier's**
 12 **check for \$400,000 on August 2nd; correct?**
 13 A. I don't know when he got the cashier's
 14 check.
 15 **Q. I will represent to you that it was**
 16 **August 2nd.**
 17 A. Okay.
 18 **Q. And so Scott gets the check on August 2nd**
 19 **and then did you fly back to the Flathead?**
 20 A. We drove.
 21 **Q. Oh, so then you drove?**
 22 A. Yes.
 23 **Q. So did you leave Salt Lake on the 2nd or**
 24 **3rd?**
 25 A. The 4th.

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1 **Q. On the 4th?**
 2 A. Uh-huh.
 3 **Q. Okay. And so you got to the Flathead**
 4 **probably the evening of the 4th?**
 5 A. Probably, yeah.
 6 **Q. Okay. And then you took the cashier's**
 7 **check into a Glacier Bank branch the next day and**
 8 **deposited it into Viking's account; correct?**
 9 A. Correct.
 10 **Q. Okay. So in the first mortgage in**
 11 **December of 2019 where you took the \$200,000 loan**
 12 **out, we walked through payments that were made to**
 13 **creditors for the RV trailer in your name and the**
 14 **Cadillac in your name and the other credit cards.**
 15 **And the remaining amount of the money went into**
 16 **your personal account; correct?**
 17 A. I do not recall.
 18 **Q. Okay. And was some of that -- I think it**
 19 **was about 140,000 that you got from that**
 20 **mortgage -- if you look at Exhibit 19, the -- Okay.**
 21 **So you ended up, after paying off those debts,**
 22 **walking away with \$120,000; do you see that?**
 23 A. Yes.
 24 **Q. Okay. That \$120,000 didn't go back to**
 25 **Scott; correct?**

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1 A. Some of it did, yes.
 2 **Q. Okay. And some of it -- what was some of**
 3 **it that went back to Scott, how did it go back to**
 4 **Scott?**
 5 A. I started paying all the bills.
 6 **Q. Okay. And you've given me a list, and**
 7 **Exhibit 6 is a list that you've put together of**
 8 **bills that you say were paid for Scott?**
 9 A. Yes.
 10 **Q. Okay. And I'm actually going to -- So**
 11 **this is 23, this is Exhibit 23.**
 12 **EXHIBITS:**
 13 (Deposition Exhibit Number 23 marked for
 14 identification.)
 15 **Q. (BY MR. GARDNER) And this is a list you**
 16 **put together, and that was provided to us in**
 17 **response to discovery requests; correct?**
 18 A. Correct.
 19 **Q. Okay. And the intent in this list was to**
 20 **identify amounts that you claim you or Viking have**
 21 **paid on behalf of Scott; correct?**
 22 A. Correct.
 23 **Q. Okay.**
 24 A. And mine's just updated with the most
 25 recent payments on the house, everything else is

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1 the same.
 2 **Q. Okay. So if we look at the last two**
 3 **pages, you identify \$92,000 of money that you say**
 4 **was spent on remodeling the house. Was the bulk of**
 5 **that 92,000 spent shortly after the first loan in**
 6 **December of 2019? Was a lot of that money spent to**
 7 **remodel the house at that time? Or tell me about**
 8 **the length of that remodel.**
 9 A. Still ongoing.
 10 **Q. Still ongoing?**
 11 A. Yes. I know that the carpet was
 12 purchased and I believe the dishwasher prior to,
 13 but that's really it, we've just done it as we
 14 could. And with COVID, you couldn't even get
 15 anything, couldn't order anything.
 16 **Q. Okay. And so that \$92,000, that is all**
 17 **of the money that you've put into the house for the**
 18 **remodel; correct?**
 19 A. No, it's -- it's been updated since then,
 20 that's what I changed, because we continued to
 21 build it, it's 98.
 22 **Q. Okay.**
 23 A. Just with a couple of things.
 24 **Q. That would be on that Exhibit 6 that I**
 25 **made a copy of?**

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1 A. Correct.
 2 **Q. Okay.**
 3 A. With the timeline.
 4 **Q. Okay. So \$98,000?**
 5 A. Yes.
 6 **Q. Okay. So is your position that all of**
 7 **that \$98,000 should be a credit back against the**
 8 **\$400,000 Scott gave you?**
 9 MR. MURPHY: Objection, calls for a legal
 10 conclusion. Go ahead and answer.
 11 A. Yes.
 12 **Q. (BY MR. GARDNER) Okay. So if that**
 13 **should be a credit back against it for you,**
 14 **shouldn't the house just be in Scott's name?**
 15 MR. MURPHY: Objection, calls for a legal
 16 conclusion. Go ahead and answer.
 17 A. Probably.
 18 **Q. (BY MR. GARDNER) Yeah, and the money was**
 19 **Scott's that you used to purchase it; correct?**
 20 A. Correct.
 21 **Q. And a lot of the loans that were taken**
 22 **out against the house were used to pay off vehicles**
 23 **and things that are titled in your name; correct?**
 24 A. Correct.
 25 **Q. So that wasn't Scott's, but the house was**

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1 **used to do all of that; right?**
 2 MR. MURPHY: Well, objection,
 3 argumentative and complex. Answer to extent that
 4 you can.
 5 **Q. (BY MR. GARDNER) Okay. A lot of the**
 6 **current debt against the house is money that was**
 7 **taken out to pay off assets that are in your name,**
 8 **like the fifth wheel and your car and things like**
 9 **that; correct?**
 10 A. I wouldn't say a lot of the money, no,
 11 but some, yes.
 12 **Q. And some of that financing was used to**
 13 **pay off your credit cards; correct?**
 14 A. Yes.
 15 **Q. Okay. And in 2021 did you do a**
 16 **refinancing?**
 17 A. I believe so, I think it was April or
 18 something.
 19 **Q. Okay. Whose idea was it to do the**
 20 **refinancing?**
 21 A. Mine.
 22 **Q. And why did you need to do a refinancing**
 23 **in April of 2021?**
 24 A. I believe I got a lower interest rate.
 25 Oh, yes, I got a lower interest rate.

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1 **Q. Okay. But as of 2021, your balance on**
2 **the first mortgage was less than \$200,000; right?**

3 A. I don't recall.

4 **Q. Well, the original loan amount was**
5 **\$200,000 and you stayed current on the loan;**
6 **correct?**

7 A. Yes.

8 **Q. So it would've been less than that?**

9 A. Yeah, but I don't know what dollar
10 amount, yes.

11 **Q. Okay. I'm going to hand you Exhibit 24.**

12 **EXHIBITS:**

13 (Deposition Exhibit Number 24 marked for
14 identification.)

15 **Q. (BY MR. GARDNER) And do you recognize**
16 **that as the Deed of Trust that was placed on it**
17 **when you refinanced on April 26th, 2021?**

18 A. Yes.

19 **Q. And if you'd turn to the second page,**
20 **this loan's for \$285,000?**

21 A. It wasn't for -- I didn't get \$285,000.

22 **Q. Because you had to pay off the first**
23 **mortgage.**

24 A. Yes, so this is the total amount.

25 **Q. But that's at least \$85,000 more than you**

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1 **owed on the first one?**

2 A. Correct.

3 **Q. One of my issues is I don't have any**
4 **closing statements or the loan application for when**
5 **you did the refinance, so I'd ask that you**
6 **supplement the discovery with those.**

7 **Do you recall in April of 2021 what you**
8 **used that extra money for?**

9 A. I do not.

10 **Q. Okay. I'm going to show you what we'll**
11 **mark as Exhibit 25.**

12 **EXHIBITS:**

13 (Deposition Exhibit Number 25 marked for
14 identification.)

15 THE WITNESS: Are we done with this one?

16 MR. GARDNER: Yep.

17 **Q. (BY MR. GARDNER) Exhibit 25 is a Google**
18 **Earth picture, and that is your residence; correct?**

19 A. Yes.

20 **Q. Okay. Now, in the driveway it looks like**
21 **there's a rather large boat up by the house; do you**
22 **see that?**

23 A. Yes.

24 **Q. Whose boat is that?**

25 A. That's mine.

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1 **Q. What year of boat is it?**

2 A. 2016.

3 **Q. When did you buy it?**

4 A. Last year.

5 **Q. Is that what you used the money from the**
6 **refi for?**

7 A. I took a loan on it.

8 **Q. So it's a 2016 boat, how much did you buy**
9 **that boat for?**

10 A. I don't have the exact number in front of
11 me.

12 **Q. Roughly?**

13 A. 50 grand.

14 **Q. Did you make a down payment on the boat?**

15 A. I did not.

16 **Q. Okay. Who's that financed through?**

17 A. USAA.

18 **Q. Who did you buy the boat from?**

19 A. Jesco Marine.

20 **Q. What kind of boat is it?**

21 A. Chaparral.

22 **Q. And you said the purchase price that**
23 **\$50,000?**

24 A. Roughly.

25 **Q. And you didn't make any down payment on**

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1 **it?**

2 A. No.

3 **Q. Did you trade anything in on it?**

4 A. No.

5 **Q. Okay. Over to the left up by the house**
6 **there's something that looks like a trailer, do you**
7 **know what that is?**

8 A. I believe that's Scott's trailer.

9 **Q. What --**

10 A. I don't know why it's white, but yeah.

11 **Q. What trailer is that?**

12 A. His trailer, he has a trailer.

13 **Q. What kind of trailer?**

14 A. I don't know what kind it is.

15 **Q. Is that a -- has he had that for a long**
16 **time?**

17 A. Yes.

18 **Q. Is that the old Pace American trailer?**

19 MR. WILLIAMS: Yeah, let's see where --
20 let's see if I can see the picture. Where is it?
21 This thing?

22 MR. GARDNER: Up by the garage.

23 THE WITNESS: Yeah, that's it, the old
24 Pace American trailer, yeah.

25 MR. GARDNER: Okay.

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1 **Q. (BY MR. GARDNER) Do you know what the**
 2 **two vehicles up by the garage are, there's a white**
 3 **one and a black one?**

4 A. Well, that white one's my Cadillac, I
 5 believe, and I think right behind it is Scott's
 6 truck.

7 **Q. Okay. And then down the driveway a**
 8 **little, I assume that is your fifth wheel RV?**

9 A. It is.

10 **Q. And that's the one that was paid off out**
 11 **of the initial financing --**

12 A. Yes.

13 **Q. -- correct? And that is in your name?**

14 A. It is.

15 **Q. And what year is that?**

16 A. I think it's a 2018, maybe 2017.

17 **Q. And I assume, since it was paid off, you**
 18 **don't owe anything on that; correct?**

19 A. Correct.

20 **Q. And then moving down, it looks like**
 21 **there's another boat off of the driveway to the**
 22 **left?**

23 A. Yes.

24 **Q. What is that boat?**

25 A. I don't know what that boat is.

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1 MR. WILLIAMS: Is that a boat or a junk
 2 trailer?

3 A. There's a bunch of junk there.

4 **Q. (BY MR. GARDNER) Okay. That right**
 5 **there?**

6 A. Uh-huh.

7 **Q. It looks like beside it there's another**
 8 **trailer or maybe an old dock?**

9 A. These are heaps --

10 MR. WILLIAMS: It's a hunk of metal.

11 A. Yeah, metal.

12 MR. WILLIAMS: It's about a foot tall
 13 hunk of metal.

14 **Q. (BY MR. GARDNER) Okay. The hunk of**
 15 **metal, which is kind of a uniform color, but to the**
 16 **left of it, is that not a boat?**

17 A. I believe it is a boat, yes. It's not
 18 mine.

19 **Q. Okay. Whose is it?**

20 A. I don't know whose it is.

21 MR. WILLIAMS: I can't even tell from
 22 that picture, I think it's a junk trailer, maybe a
 23 wood trailer with a tarp on it. But I don't know,
 24 it's hard to tell from there.

25 MR. GARDNER: Okay.

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1 MR. WILLIAMS: When was that picture
 2 taken? I don't know. Well, it's gotta be -- yeah,
 3 it's gotta be recent because that's definitely my
 4 truck.

5 MR. GARDNER: All right. All right.

6 **Q. (BY MR. GARDNER) So you don't recall**
 7 **anything you did with the extra money from the**
 8 **refinance in April of 2021?**

9 A. It wasn't like a lump-sum dollar amount
 10 that I spent on something, it's all bills and into
 11 the house.

12 **Q. Okay. Are you current on that mortgage?**

13 A. I am.

14 **Q. Okay. I may have asked you this already,**
 15 **but did Scott have now or ever have access to**
 16 **Viking's bank accounts?**

17 A. No.

18 **Q. Okay. So unless you agreed to give money**
 19 **to him, he couldn't go in and take it?**

20 A. Correct.

21 MR. GARDNER: Let's go off the record for
 22 a second.

23 (Whereupon, the proceedings were in
 24 recess at 4:38 p.m. and subsequently reconvened at
 25 4:44 p.m., and the following proceedings were

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1 entered of record.)

2 MR. GARDNER: Back on.

3 **Q. (BY MR. GARDNER) So have you got any**
 4 **clarification on whether you or Viking owns the**
 5 **fifth wheel and the Cadillac?**

6 A. I know they're registered in Viking
 7 Investments LLC, but I don't know what date that
 8 took place.

9 **Q. Okay. Okay. So there's the 2018 fifth**
 10 **wheel registered in Viking?**

11 A. (Witness nods head.)

12 **Q. And the 2013 Cadillac Escalade?**

13 A. It's a '14. It's not an Escalade but,
 14 yeah, Cadillac.

15 **Q. Okay. What name is the boat that was**
 16 **purchased last year registered in?**

17 A. Mine.

18 **Q. Okay. Do you have any other vehicles,**
 19 **boats or RVs registered in your name?**

20 A. Subaru, it's not in my name, it's in
 21 Viking Investments LLC, but the Subaru is also in
 22 there.

23 **Q. Okay. What year is that Subaru?**

24 A. 2016.

25 **Q. Are there any other boats, vehicles,**

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CANDY WILLIAMS

<p style="text-align: right;">Page 78</p> <p>1 trailers, anything else that are owned by Viking or 2 you? 3 A. The fifth wheel, the two cars, no. 4 Q. Okay. What does your husband drive, 5 Scott? 6 A. A truck. 7 Q. What year is the truck? 8 A. I have no idea. 9 Q. Has he got a new truck recently? 10 A. I wish. No. 11 Q. No? 12 A. It's a piece of crap. 13 Q. So he doesn't have a new truck that he 14 drives? 15 A. No. 16 Q. Okay. It's the same truck he's had 17 since -- 18 A. Forever. 19 Q. Okay. I want to mark Exhibit 26. 20 EXHIBITS: 21 (Deposition Exhibit Number 26 marked for 22 identification.) 23 Q. (BY MR. GARDNER) And Exhibit 26 are 24 Viking Investments' answers to the discovery 25 requests. You recognize those answers?</p>	<p style="text-align: right;">Page 80</p> <p>1 the February 1, 2020 bank statement for your 2 American First Credit Union account? 3 A. It is. 4 Q. Okay. And that's the one we talked about 5 earlier that's one of your personal accounts? 6 A. Yes. 7 Q. And then the other personal account you 8 have is a checking account at Glacier Bank? 9 A. I also have a savings account at Glacier 10 Bank. 11 Q. Okay. So the checking account and 12 savings account -- 13 A. And Viking Investments LLC. 14 Q. So there's three bank accounts at Glacier 15 Bank? 16 A. That's correct. 17 Q. And you said you do not use the bank 18 account that you said your name is on with your 19 husband? 20 A. No. 21 Q. Okay. 22 MR. GARDNER: Thank you, I'm done. 23 MR. MURPHY: Just a couple questions. 24 EXAMINATION 25 BY MR. MURPHY:</p>
<p style="text-align: right;">Page 79</p> <p>1 A. Yes. 2 Q. And do you remember putting together the 3 information and providing documents for these 4 discovery responses? 5 A. Yes. 6 Q. And did you review them to make sure they 7 were accurate? 8 A. To the best of my recollection, yes. 9 Q. Okay. I do not have a question in there. 10 I'll mark these Exhibit 27. 11 EXHIBITS: 12 (Deposition Exhibit Number 27 marked for 13 identification.) 14 Q. (BY MR. GARDNER) And those are your 15 responses to the first discovery requests; correct? 16 A. Correct. 17 Q. And you had a chance to review those and 18 help provide the answers and make sure they were 19 accurate; correct? 20 A. Yes. 21 EXHIBITS: 22 (Deposition Exhibit Number 28 marked for 23 identification.) 24 Q. (BY MR. GARDNER) I'm going to hand you 25 what we'll mark as Exhibit 28. Is that a copy of</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. The loan application that was referred to 2 previously from Glacier Bank {sic} that had all the 3 credit card debt and that sort of thing, do you 4 know where the bank got that information from? 5 A. Me? 6 Q. Okay. Did you provide that? 7 A. No, I'm sorry, I was like, are you asking 8 me? 9 Q. Yeah. 10 A. Yes, okay. Glacier Bank, you mean the 11 lone application? 12 Q. Yeah, with all the credit cards. 13 A. Glacier Mortgage? 14 Q. Excuse me, Glacier Mortgage; right? 15 A. Yes. 16 Q. Okay. I'm referring to Exhibit 17. Did 17 they get all that information from you or from some 18 other source? 19 A. My credit report. 20 Q. Okay. And did you do anything after you 21 saw this? 22 A. I called the credit card companies to try 23 to get my name removed off them. 24 Q. Was it the company or the credit 25 reporting agencies or both or what?</p>

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IN RE: WILLIAMS, DEBTOR

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1 A. It was the companies themselves.

2 MR. MURPHY: Okay. Nothing further.

3 MR. GARDNER: Just one follow-up.

4 EXAMINATION

5 BY MR. GARDNER:

6 **Q. So after -- so in December or January of**
 7 **2019, when you saw those credit cards on your**
 8 **credit application, you called the credit card**
 9 **companies to try to at that point get your name off**
 10 **of Scott's credit cards; correct?**

11 A. Correct.

12 MR. GARDNER: Okay. That's it.

13 MR. MURPHY: Okay.

14 (Deposition concluded at 4:53 p.m.)

15 Witness excused, signature reserved.)

16 * * *

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1 CERTIFICATE OF WITNESS

2

3 PAGE LINE

4

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9

10 I hereby certify that this is a true and
 11 correct copy of my testimony, together with any
 12 changes I have made on this and any subsequent
 13 pages attached hereto.

14

15 Dated on this the _____ day of _____, 2023.

16

17 _____
 18 CANDY WILLIAMS, Deponent.

19

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21

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25

JEFFRIES COURT REPORTING, INC.

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(406) 721-1143

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STATE OF MONTANA)
: ss.
County of Missoula)

I, Terra Rohlfs, RPR, Freelance Court Reporter and Notary Public for the State of Montana, residing in Hamilton, Montana, do hereby certify:

That I was duly authorized to swear in the witness and did report the deposition of CANDY WILLIAMS in this cause;

That the reading and signing of the deposition by the witness have been expressly reserved;

That the foregoing pages of this deposition constitute a true and accurate transcription of my stenotype notes of the testimony of said witness.

I further certify that I am not an attorney nor counsel of any of the parties; nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on this the 20th day of September, 2023.

Terra Rohlfs, RPR,
Freelance Court Reporter
Notary Public, State of Montana
Residing in Hamilton, Montana
My Commission expires: 11/4/23

IN RE: WILLIAMS, DEBTOR

9/14/2023

CANDY WILLIAMS

1 September 20th, 2023

2 Edward "Rusty" A. Murphy, Esq.
3 Murphy Law Offices, PLLC
4 127 North Higgins, Suite 310
5 Central Square Building
6 Missoula, Montana 59802

7 Re: IN RE: SCOTT K. WILLIAMS, DEBTOR
8 Deposition of CANDY WILLIAMS

9 Dear Counsel,

10 Please find attached your copy of the deposition
11 mentioned above. I have also attached a
12 "CORRECTIONS TO DEPOSITION" page following this
13 page. Have the deponent read and sign the
14 deposition, noting any corrections on the page
15 provided, and have it sent back to me.

16 You have 30 days to accomplish reading. After that
17 we will note on the release letter that the witness
18 has waived the right to read the deposition, and we
19 will deliver the Original to the ordering party.

20 If you have any questions, please feel free to give
21 me a call.

22 Sincerely,

23 JEFFRIES COURT REPORTING, INC.

24

25 Rona Chenoweth, Office Manager

26

27 cc: Trent M. Gardner, Esq.
28 Hannah S. Willstein, Esq.

29

30 Attachment

31

JEFFRIES COURT REPORTING, INC.

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IN RE: WILLIAMS, DEBTOR

9/14/2023

CANDY WILLIAMS

1 Trent M. Gardner, Esq.
Hannah S. Willstein, Esq.
2 Goetz, Geddes & Gardner, P.C.
The Ketterer Building, 35 North Grand
3 P.O. Box 6580
Bozeman, Montana 59771-6580
4

5 Re: IN RE: SCOTT K. WILLIAMS, DEBTOR
6

7 PLEASE ATTACH TO YOUR COPY OF THE DEPOSITION OF:
8 CANDY WILLIAMS
THURSDAY, SEPTEMBER 14, 2023
9

10 _____ Please find enclosed the Original
deposition in the above-named case. It has been
11 read and signed. We are now delivering it to you
since you were the ordering party.
12

13 _____ The time for reading and signing has passed,
and we are delivering the Original to you since you
14 were the ordering party.

15
16 Rona Chenoweth, Office Manager

17 Date: _____
18

19 cc: Edward "Rusty" A. Murphy, Esq.
20
21
22
23
24
25

IN RE: WILLIAMS, DEBTOR

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CANDY WILLIAMS

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IN RE: WILLIAMS, DEBTOR

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